

Employee Post-Travel Disclosure of Travel Expenses

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Post-Travel Filing Instructions: Complete this form within 30 days of returning from travel. Submit all forms to the **Office of Public Records in 232 Hart Building.**

In compliance with Rule 35.2(a) and (c), I make the following disclosures with respect to travel expenses that have been or will be reimbursed/paid for me. I also certify that I have attached:

- ☒ The **original** *Employee Pre-Travel Authorization* (Form RE-1), **AND**
- ☒ A **copy** of the *Private Sponsor Travel Certification Form* with all attachments (itinerary, invitee list, etc.)

Private Sponsor(s) (list all): Council on Foreign Relations

Travel date(s): 9/21/17

Name of accompanying family member (if any): N/A

Relationship to Traveler: ☐ Spouse ☐ Child

IF THE COST OF LODGING **DID NOT INCREASE** DUE TO THE ACCOMPANYING SPOUSE OR DEPENDENT CHILD, ONLY INCLUDE LODGING COSTS IN EMPLOYEE EXPENSES. (Attach additional pages if necessary.)

Expenses for Employee:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate	\$445.00 Rail \$59.52 Bus	N/A	\$16.03	
<input checked="" type="checkbox"/> Actual Amount				

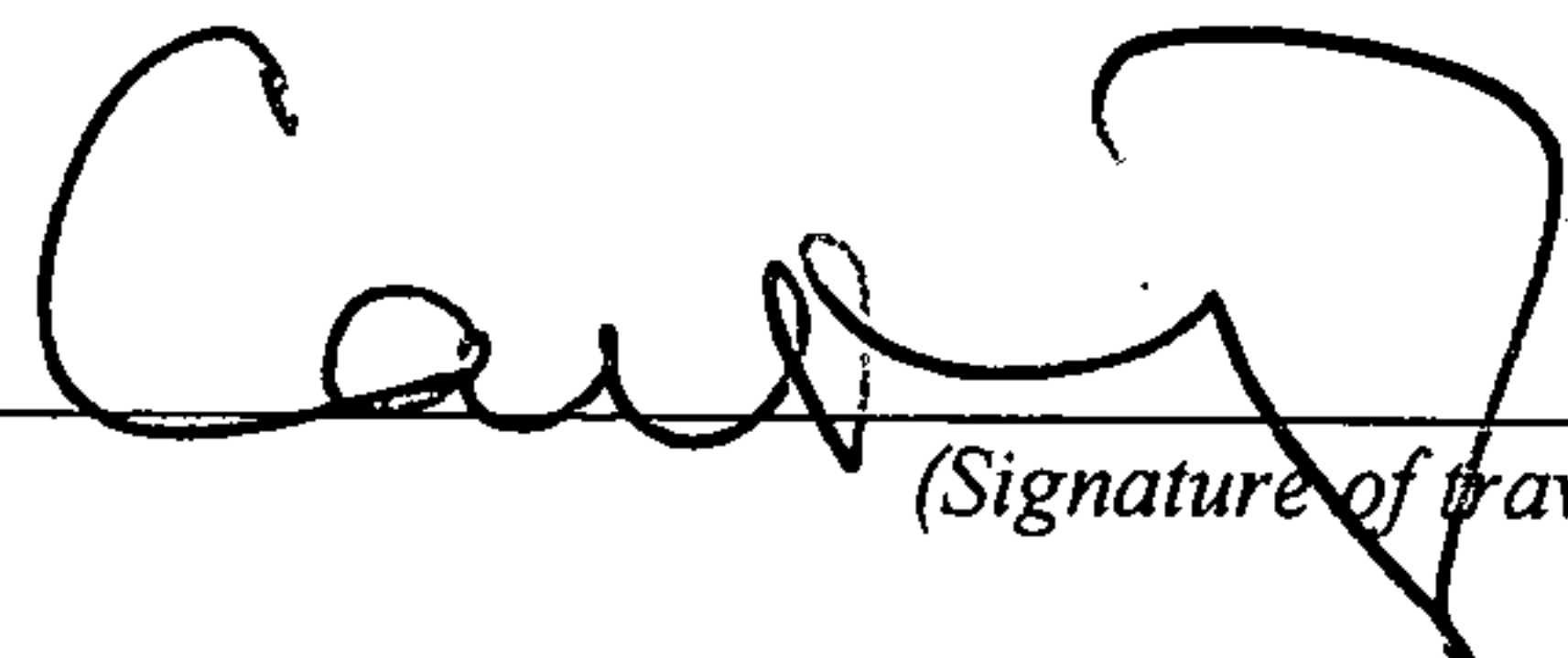
Expenses for Accompanying Spouse or Dependent Child (if applicable):

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate				
<input type="checkbox"/> Actual Amount				

Provide a description of all meetings and events attended. See Senate Rule 35.2(c)(6). (Attach additional pages if necessary.): Itinerary attached

09/24/2018
(Date)

Caitlin Poling
(Printed name of traveler)


(Signature of traveler)

TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER:

I have made a determination that the expenses set out above in connections with travel described in the *Employee Pre-Travel Authorization* form, are necessary transportation, lodging, and related expenses as defined in Rule 35.

(Date)


(Signature of Supervising Senator/Officer)

Date/Time Stamp:

EMPLOYEE PRE-TRAVEL AUTHORIZATION

Pre-Travel Filing Instructions: Complete and submit this form at least 30 days prior to the travel departure date to the **Select Committee on Ethics in SH-220**. Incomplete and late travel submissions will **not** be considered or approved. This form **must** be typed and is available as a fillable PDF on the Committee's website at ethics.senate.gov. Retain a copy of your entire pre-travel submission for your required post-travel disclosure.

Name of Traveler: Caitlin Poling

Employing Office/Committee: Office of Senator David Perdue

Private Sponsor(s) (list all): Council on Foreign Relations

Travel date(s): September 21, 2018

*Note: If you plan to extend the trip for any reason you **must** notify the Committee.*

Destination(s): New York, NY

Explain how this trip is specifically connected to the traveler's official or representational duties:

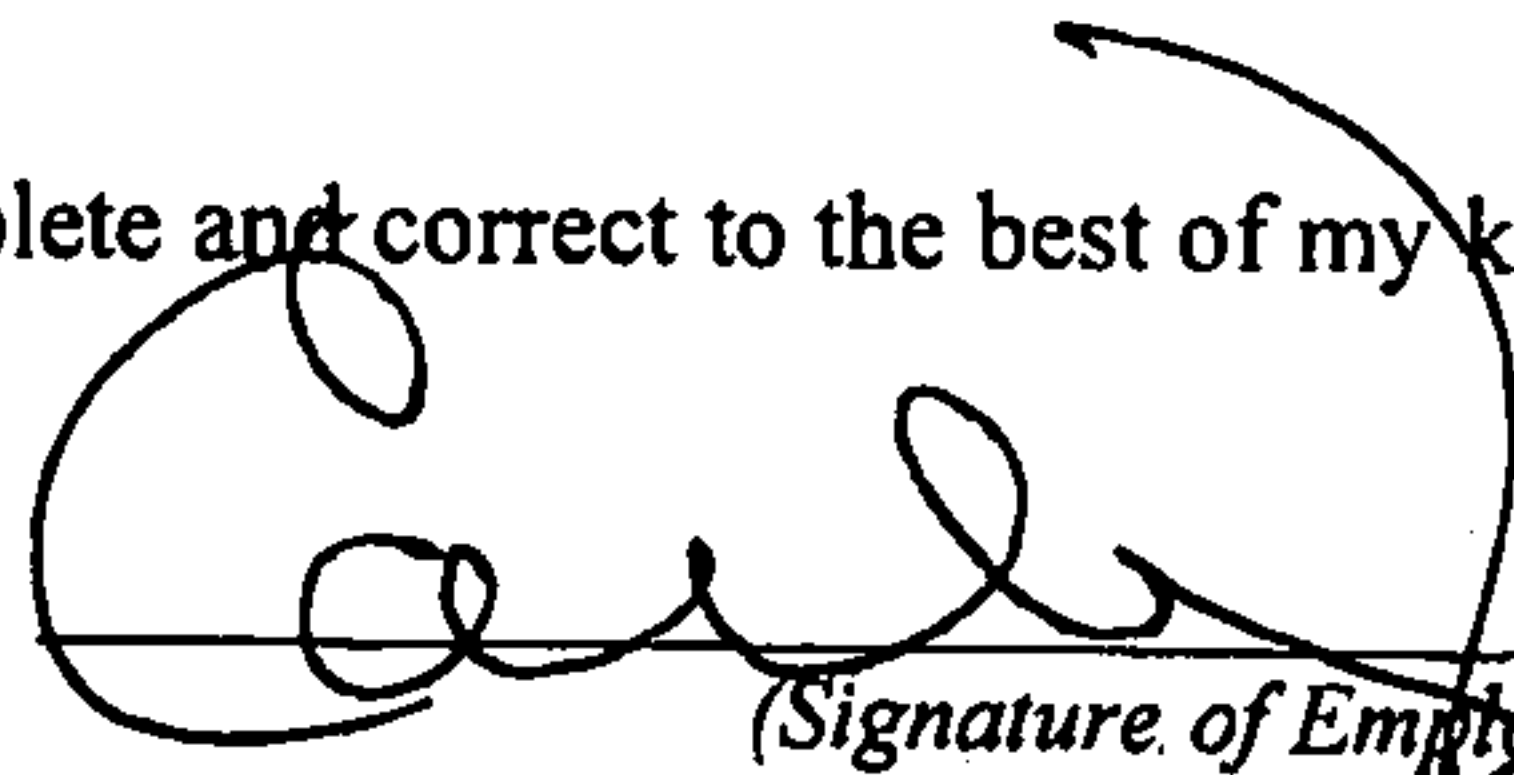
As a participant in the Council on Foreign Relations' (CFR) foreign policy study group, I will be traveling to New York City to attend a panel discussion and meet with foreign policy and national security experts located at CFR's headquarters. As National Security Advisor to Sen. Perdue, I cover foreign policy and defense issues for the senator. These discussions will help inform my work for him on these issues.

Name of accompanying family member (if any): _____

Relationship to Employee: ☐ Spouse ☐ Child

I certify that the information contained in this form is true, complete and correct to the best of my knowledge:

9/17/18
(Date)
(addendum to 8/17/18 form)


(Signature of Employee)

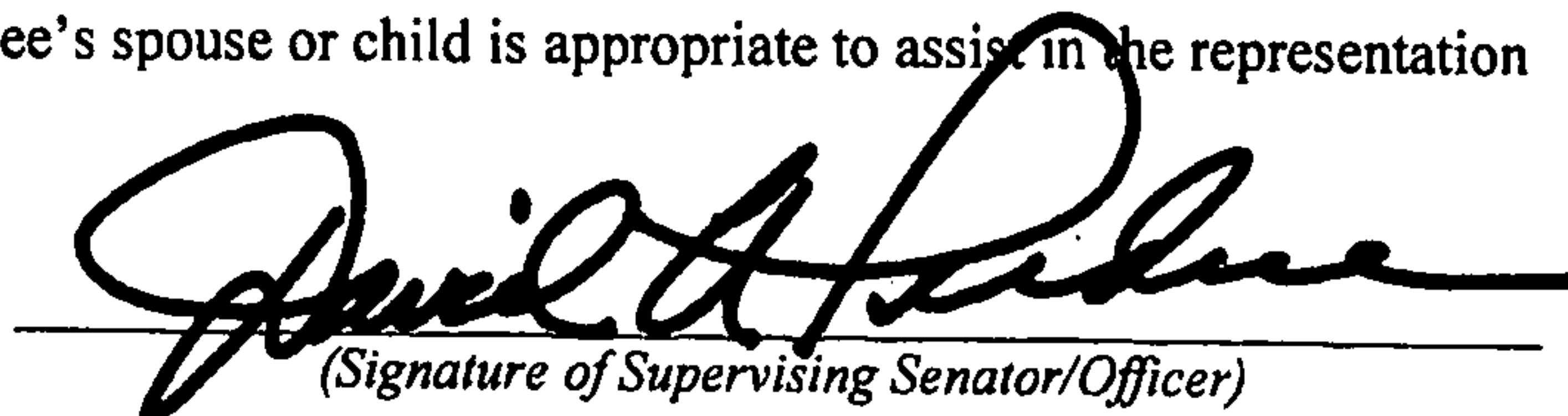
TO BE COMPLETED BY SUPERVISING SENATOR/OFFICER (President of the Senate, Secretary of the Senate, Sergeant at Arms, Secretary for the Majority, Secretary for the Minority, and Chaplain):

I, Senator David Perdue hereby authorize Caitlin Poling
(Print Senator's/Officer's Name) (Print Traveler's Name)

an employee under my direct supervision, to accept payment or reimbursement for necessary transportation, lodging, and related expenses for travel to the event described above. I have determined that this travel is in connection with his or her duties as a Senate employee or an officeholder, and will not create the appearance that he or she is using public office for private gain.

I have also determined that the attendance of the employee's spouse or child is appropriate to assist in the representation of the Senate. (signify "yes" by checking box) ☐

9/17/18
(Date)


(Signature of Supervising Senator/Officer)

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should **NOT** submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

The Senate Member, officer, or employee **MUST** also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

1. Sponsor(s) of the trip (please list all sponsors): Council on Foreign Relations (CFR)
2. Description of the trip: Provide congressional staff members participating in CFR's foreign policy study group an opportunity to visit CFR's headquarters in New York. (please see attachment).
3. Dates of travel: Friday, September 21, 2018
4. Place of travel: New York . NY
5. Name and title of Senate invitees: Please see attached documentation
6. I *certify* that the trip fits one of the following categories:
 - ☒ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal and do not retain or employ registered lobbyists or agents of a foreign principal and no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.
 - ~~OR~~
 - ☐ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (*see question 9*).
7. ☒ I *certify* that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.

~~AND~~

☒ I *certify* that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.
8. I *certify* that:
 - ☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.
 - ~~AND~~
 - ☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

9. **USE ONLY IF YOU CHECKED QUESTION 6(B)**

I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

☐ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and one overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.

OR

☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and two overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (see questions 6 and 10).

OR

☐ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

10. **USE ONLY IF YOU CHECKED QUESTION 9(B)**

If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

CFR is the only sponsor of this trip and is covering all associated costs and organizing this trip.

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

CFR is an independent think tank and membership organization dedicated to being a resource for its members, government officials, and other interested citizens in order to help them better understand the world and the foreign policy choices facing the United States.

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

CFR has hosted three similar trips to New York on September 25, 2015, September 19, 2016, and September 15, 2017.

15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

CFR hosts several different meeting series on Capitol Hill for members of Congress and senior congressional staff for the purposes of informing the policy making community of the foreign policy and national security issues confronting the United States.

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
<input checked="" type="checkbox"/> Good Faith estimate	Total cost: \$450 Rail travel costs: \$400	None provided	Approx.: \$50	None provided
<input type="checkbox"/> Actual Amounts	Round-trip ground transport from rail station to CFR offices: \$50			

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation or b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

This trip is taking place with regard to congressional participation

18. Reason for selecting the location of the event or trip

The Council on Foreign Relations is headquartered in New York City.

19. Name and location of hotel or other lodging facility:

No lodging provided.

20. Reason(s) for selecting hotel or other lodging facility:

No lodging provided.

21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

Meal costs are estimated to be far less than the \$74 per diem rate for this location. No lodging is provided.

22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:

Participant will travel from Washington, DC to New York on Amtrak Acela services (business class).

23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities, alcohol, or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).

24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:

None provided.

25. I hereby *certify* that the information contained herein is true, complete and correct. (For trips involving more than one sponsor, you *must* include a completed signature page for each additional sponsor):

Signature of Travel Sponsor: _____

Name and Title: Patrick C. Costello, Director, Washington External Affairs

Name of Organization: Council on Foreign Relations

Address: 1777 F Street, NW Washington DC 20006

Telephone Number: 202-509-8458

Fax Number: 202-509-8400

E-mail Address: pcostello@cfr.org

Private Sponsor Travel Certification Form – Additional Information

2. Substantive programming will include panel discussions on issues such as current areas of concern to U.S. national security, developments in sub-Saharan Africa, international economics, cybersecurity, global energy policy, and U.S. foreign policy.

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List of Senate invitees to Council on Foreign Relations trip to New York, NY

The below mentioned employees of the United States Senate have been selected to participate in a Council on Foreign Relations (CFR) congressional study group. This is a CFR initiative where we have identified a cohort of senior-level congressional staff to participate in off-the-record dinner discussions with members of the Council on Foreign Relations, CFR fellows, and other notable individuals and is part of our ongoing efforts to help build an informed, bipartisan community of senior congressional staff from both chambers. This trip to the CFR offices in New York is part of the study group activities and participants will attend a lunch meeting, with other members of the CFR, and meet with CFR experts based in New York.

1. Jon Abdnor, Legislative Assistant, Office of Senator John Thune
2. Ryan Doherty, Military Legislative Assistant, Office of Senator Chris Coons
3. Kali Farahmand, Professional Staff Member, Senate Appropriations Subcommittee on State, Foreign Operations, and Related Programs
4. Wally Hsueh, Legislative Director, Office of Senator Steve Daines
5. James Mazol, National Security Advisor, Office of Senator Roger Wicker
6. Rick Nussio, Professional Staff Member, Senate Select Committee on Intelligence
7. Jacob Olidort, Foreign Policy Advisor, Office of Senator Orrin Hatch
8. Caitlin Poling, National Security Advisor, Office of Senator David Perdue
9. Laura Updegrove, Legislative Counsel, Office of Senator Jeff Merkley
10. Dustin Walker, Professional Staff Member, Senate Committee on Armed Services
11. Jordan Wells, Legislative Assistant, Office of Senator Gary Peters
12. Everett J.S. Price, Policy Advisor, Commission on Security and Cooperation in Europe

COUNCIL *on* FOREIGN RELATIONS

1777 F Street, NW, Washington, DC 20006
tel 202.509.8400 fax 202.509.8490 www.cfr.org

Congressional Foreign Policy Study Group

New York Program

Friday, September 21, 2018

7:55 a.m. Depart Union Station (Acela 2104)

10:50 a.m. Arrive New York Penn Station

11:30 a.m. – 12:15 p.m.

Meeting with Michael Dempsey, *National Intelligence Fellow, Council on Foreign Relations.*

Topic: Global hot spots and emerging national security challenges.

Mr. Dempsey will share his insights on current threats and areas of concern to U.S. national security.

12:30 p.m. – 1:15 p.m.

Lunch Discussion with Ambassador Michelle Gavin, *Senior Fellow for Africa Studies, Council on Foreign Relations.*

Topic: Strategic and economic priorities in Africa.

Ambassador Gavin will discuss the political, economic, and security situation in sub-Saharan African and its impacts on U.S. policy in the region.

1:15 p.m. – 2:00 p.m.

Discussion with Dr. Brad Setser, *Senior Fellow, Council on Foreign Relations.*

Topic: International finance, financial markets, and trade policy.

Dr. Setser will discuss the state of the global economy, recent Federal Reserve actions on interest rates, and how global financial markets are reacting to geopolitical events.

2:00 p.m. – 2:45 p.m.

Meeting with Richard N. Haass, *President, Council on Foreign Relations*

Topic: U.S. foreign policy and global political developments

Dr. Haass will share his thoughts on current global affairs and potential impacts on U.S. national security and foreign policy.

2:45 p.m. – 3:45 p.m.

Discussion with Dr. Adam Segal, *Ira A. Lipman Chair in Emerging Technologies and National Security and Director of the Digital and Cyberspace Policy Program, Council on Foreign Relations.*

Topic: Cybersecurity and China's technology development and acquisition strategy.

Dr. Segal will discuss recent developments in cybersecurity and how technology will impact competition with the U.S. globally, with a particular focus on China.

4:00 p.m. – 5:00 p.m.

Meeting with Amy Myers Jaffe, *David M. Rubenstein Senior Fellow for Energy and the Environment and Director of the Program on Energy Security and Climate Change, Council on Foreign Relations.*

Topic: Energy markets and the emerging geopolitics of energy.

Ms. Jaffe will discuss the effects of global energy policy on geopolitical conflicts and potential impacts for U.S. foreign policy.

5:00 p.m. Meeting Concludes, depart CFR for New York Penn Station

6:00 p.m. Depart New York Penn Station (Acela 2119)

8:53 p.m. Arrive in Washington DC

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United States Senate

SELECT COMMITTEE ON ETHICS

September 12, 2018

Caitlin Poling
Office of Senator David Perdue
United States Senate
Washington, DC 20510

Dear Ms. Poling:

This responds to your recent correspondence concerning an invitation you received to travel to the *Congressional Foreign Policy Study Group* in New York, New York, on September 21, 2018, sponsored by the Council on Foreign Relations (CFR). CFR certified to the Select Committee on Ethics (the Committee) that it will pay the *necessary expenses*¹ related to the travel and that it is neither a lobbyist, nor lobbying firm, nor an agent of a foreign principal, and it is not otherwise acting as a representative or agent of a foreign government. CFR has also certified that it does not retain or employ a registered lobbyist or agent of a foreign principal and that no registered lobbyist will accompany you at *any point throughout your trip*.²

Based on information and materials available to the Committee, and assuming the **actual** travel and travel-related expenses conform to the information and materials you provided, it appears that the proposed payment or reimbursement of necessary expenses for this trip **may be accepted** under relevant Senate Rules and the Committee's *Regulations and Guidelines for Privately-Sponsored Travel*, so long as at the time of the payment or reimbursement, CFR is neither a registered lobbyist nor lobbying firm under the Lobbying Disclosure Act of 1995, nor an agent of a foreign principal under the Foreign Agents Registration Act (and is not otherwise acting as a representative or agent of a foreign government), and provided the travel and all required documents are disclosed to the Secretary of the Senate in accordance with the provisions of Senate Rules 34 and 35.

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel*

¹ The term "necessary expenses" has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 8.


² The term "any point throughout your trip" has a specific definition. See *id.* at 2.

Certification Form, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately-Sponsored Travel**.

Finally, Senate Rule 34 requires a reporting individual,³ on his or her Financial Disclosure Report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$390 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their Financial Disclosure Report.

I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Deborah Sue Mayer
Chief Counsel and Staff Director

Enclosure: Travel Checklist

³ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$126,148 for CY 2018) or is a political fund designee and is required to file Financial Disclosure Reports.